

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GO GLOBAL RETAIL LLC

Plaintiff,

v.

DREAM ON ME, INDUSTRIES,  
INC., and DREAM ON ME, INC.

Defendant.

Case No. 1:23-cv-07987-AS

*Filed Electronically*

**DECLARATION OF COUNSEL  
IN SUPPORT OF  
MOTION TO DISMISS THE COMPLAINT  
PURSUANT TO RULE 12(B)(6)**

**JESSICA M. CARROLL, ESQ.**, certifies as follows:

1. I am an attorney-at-law of the State of New York and am admitted to practice in this District. I am a partner at the law firm of Greenbaum, Rowe, Smith & Davis LLP, attorneys for Defendants, Dream on Me Industries, Inc. and Dream On Me, Inc. (“DOM”), and as such, I am familiar with the facts set forth herein.

2. I make this Declaration in support of DOM’s Motion to Dismiss the Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

3. All exhibits attached hereto are true and accurate copies of the originals.

4. In support of DOM’s Motion, attached as Exhibit A is a copy of the Amended Complaint filed by Plaintiff, Go Global Retail LLC (“Plaintiff”), ECF No. 29.

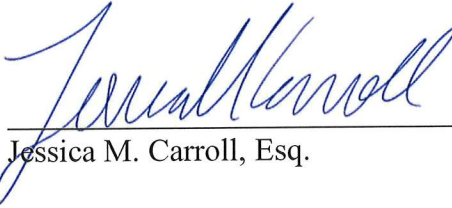
5. In support of DOM’s Motion, attached as Exhibit B is a copy of the Order Approving the Sale and Authorizing the Asset Purchase Agreement, entered on July 11, 2023, by the United States Bankruptcy Court for the District of New Jersey, *In re Bed Bath & Beyond, Inc., et al*, Case No. 23-13359-VFP (Bankr. D.N.J. July 11, 2023), ECF No. 1314.

6. In support of DOM’s Motion, attached as Exhibit C is a copy of the Order Approving the Auction and Bid Procedures, entered on April 25, 2023, by the United States

Bankruptcy Court for the District of New Jersey, *In re Bed Bath & Beyond, Inc., et al*, Case No. 23-13359-VFP (Bankr. D.N.J. July 11, 2023), ECF No. 92.

**GREENBAUM, ROWE, SMITH & DAVIS LLP**  
**Attorneys for Defendant,**  
**Dream On Me Industries, Inc.**

By: \_\_\_\_\_



Jessica M. Carroll, Esq.

Dated: January 31, 2024